

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION



UNITED STATES OF AMERICA, )  
)  
Petitioner, )  
)  
v. )  
)  
BRIAN P. MANOOKIAN, )  
)  
Respondent. )

Civil Action No.: 3:18-cv-00895  
JUDGE TRAUGER

**MOTION FOR CONTINUANCE**

COMES NOW, the United States of America. by and through its agency, the Department of Treasury Internal Revenue Service, by and through the United States Attorney and the undersigned Assistant United States Attorney, and asks this Court to continue the hearing in this case. In support of this Motion the United States would show that:

1. This petition to enforce an administrative summons of the Internal Revenue Service was filed on September 21, 2018.
2. The petitioner has obtained service of process over the taxpayer respondent, Brian P. Manookian.
3. Since obtaining service of process, the taxpayer respondent has been in touch with the IRS to resolve all issues implicated in this summons enforcement proceeding, including the very real possibility of paying the underlying tax liability in full. Counsel in good faith believes that the parties will resolve all issues implicated by this lawsuit without further court proceeding. However, at the present time, not all issues are completely resolved. At the same time, it appears those issues not completely resolved will be satisfactorily resolved.